

**UNITED STATES DISTRICT COURT  
FOR THE  
SOUTHERN DISTRICT OF NEW YORK**

Frank Liu	)	
	)	
Plaintiff,	)	
	)	Case No. 1:22-cv-09084-JHR-OTW
v.	)	
	)	Judge Jennifer H. Rearden
The Nielsen Company (US) LLC, et al.,	)	
	)	
Defendants.	)	
	)	
	)	

**DEFENDANTS THE NIELSEN COMPANY US LLC AND TNC US HOLDINGS'  
RESPONSE TO PLAINTIFF'S MOTION REQUESTING SETTLEMENT  
CONFERENCE (ECF 132)**

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Attorneys for Defendants

Defendants The Nielsen Company (US) LLC and TNC US Holdings (collectively, “Defendants”) respectfully submit this response to Plaintiff Frank Liu’s (“Plaintiff”) Motion Requesting Settlement Conference (ECF No. 132). Defendants do not oppose Plaintiff’s request for a settlement conference so long as it occurs after Plaintiff is appointed *pro bono* counsel. Plaintiff continues – without any basis – to accuse Defendants of engaging in wrongdoing in connection with settlement communications. He has also filed confidential settlement communications on the public record, imposing unnecessary and additional costs on the Court and Defendants. Based on historical settlement discussions, Defendants believe any settlement conference is highly unlikely to succeed unless and until Plaintiff has been appointed counsel.

Dated: Chicago, Illinois  
February 21, 2025

Respectfully submitted,

By: /s/ Cardelle Spangler

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